

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**SHERRI STILL**  
**a.k.a. SHERRI HARRIS**  
**a.k.a. SHERRI WILLIAMSON**  
**8725 Emsdale Court**  
**Las Vegas, CA 89147**

Case No. 2013-619

**Registered Nurse License No. 592521**

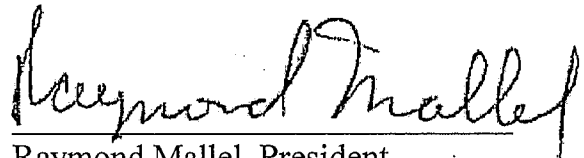
Respondent

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **May 28, 2013.**

IT IS SO ORDERED **May 28, 2013.**



Raymond Mallel, President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-619

13 **SHERRI STILL, AKA SHERRI HARRIS,**  
14 **AKA SHERRI WILLIAMSON**  
15 **8725 Emsdale Court**  
16 **Las Vegas, NV 89147**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

17 **Registered Nurse License No. 592521**

18 Respondent.

19 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
20 proceeding that the following matters are true:

**PARTIES**

21 1. Louise R. Bailey, M.Ed., RN ("Complainant") is the Executive Officer of the Board  
22 of Registered Nursing. She brought this action solely in her official capacity and is represented in  
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Sydney M.  
24 Mehringer, Deputy Attorney General.

25 2. Sherri Still, aka Sherri Harris, aka Sherri Williamson ("Respondent") is representing  
26 herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

27 3. On or about December 21, 2001, the Board of Registered Nursing issued Registered  
28 Nurse License No. 592521 to Sherri Still, aka Sherri Harris, aka Sherri Williamson  
("Respondent"). The Registered Nurse License was in full force and effect at all times relevant to

1 the charges brought in Accusation No. 2013-619 and will expire on March 31, 2015, unless  
2 renewed.

3 **JURISDICTION**

4 4. Accusation No. 2013-619 was filed before the Board of Registered Nursing  
5 ("Board"), Department of Consumer Affairs, and is currently pending against Respondent. The  
6 Accusation and all other statutorily required documents were properly served on Respondent on  
7 February 13, 2013. Respondent timely filed her Notice of Defense contesting the Accusation. A  
8 copy of Accusation No. 2013-619 is attached as Exhibit A and incorporated by reference.

9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, and understands the charges and allegations in  
11 Accusation No. 2013-619. Respondent also has carefully read, and understands the effects of this  
12 Stipulated Surrender of License and Order.

13 6. Respondent is fully aware of her legal rights in this matter, including the right to a  
14 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
15 her own expense; the right to confront and cross-examine the witnesses against her; the right to  
16 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to  
17 compel the attendance of witnesses and the production of documents; the right to reconsideration  
18 and court review of an adverse decision; and all other rights accorded by the California  
19 Administrative Procedure Act and other applicable laws.

20 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
21 every right set forth above.

22 **CULPABILITY**

23 8. Respondent admits the truth of each and every charge and allegation in Accusation  
24 No. 2013-619, agrees that cause exists for discipline and hereby surrenders her Registered Nurse  
25 License No. 592521 for the Board's formal acceptance.

26 9. Respondent understands that by signing this stipulation she enables the Board to issue  
27 an order accepting the surrender of her Registered Nurse License without further process.

28 ///

**CONTINGENCY**

10. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

**ORDER**

IT IS HEREBY ORDERED that Registered Nurse License No. 592521, issued to Respondent Sherri Still, aka Sherri Harris, aka Sherri Williamson is surrendered and accepted by the Board of Registered Nursing.

1. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
2 license history with the Board of Registered Nursing.

3 2. Respondent shall lose all rights and privileges as a registered nurse in California as of  
4 the effective date of the Board's Decision and Order.

5 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was  
6 issued, her wall certificate on or before the effective date of the Decision and Order.

7 4. If Respondent ever files an application for licensure or a petition for reinstatement in  
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
9 comply with all the laws, regulations and procedures for reinstatement of a revoked license in  
10 effect at the time the petition is filed, and all of the charges and allegations contained in

11 Accusation No. 2013-619 shall be deemed to be true, correct and admitted by Respondent when  
12 the Board determines whether to grant or deny the petition.

13 5. If and when Respondent's license is reinstated, she shall pay to the Board costs  
14 associated with its investigation and enforcement pursuant to Business and Professions Code  
15 section 125.3 in the amount of \$1,080.00. Respondent shall be permitted to pay these costs in a  
16 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the  
17 Board from reducing the amount of cost recovery upon reinstatement of the license.

18 6. If Respondent should ever apply or reapply for a new license or certification, or  
19 petition for reinstatement of a license, by any other health care licensing agency in the State of  
20 California, all of the charges and allegations contained in Accusation, No. 2013-619 shall be  
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)  
24 years from the effective date of the Board of Registered Nursing's Decision and Order.

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28 ///

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: \_\_\_\_\_

SHERRI STILL, AKA SHERRI HARRIS, AKA  
SHERRI WILLIAMSON  
Respondent

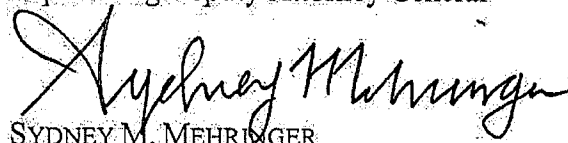
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: March 20, 2013

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
KAREN B. CHAPPELLE  
Supervising Deputy Attorney General

  
SYDNEY M. MEHRINGER  
Deputy Attorney General  
*Attorneys for Complainant*

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DATED:

## ENDORSEMENT

Stipulated Surrender of License (Case No. 2013-619)

**Exhibit A**

**Accusation No. 2013-619**

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 SYDNEY M. MEHRINGER  
Deputy Attorney General  
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6 Facsimile: (213) 897-2804  
E-mail: Sydney.Mehringer@doj.ca.gov  
7 Attorneys for Complainant

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

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13 **AKA SHERRI WILLIAMSON**  
14 **8725 Emsdale Court**  
**Las Vegas, NV 89147**

**A C C U S A T I O N**

15 **Registered Nurse License No. 592521**

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
21 Consumer Affairs.

22 2. On or about December 21, 2001, the Board of Registered Nursing ("Board") issued  
23 Registered Nurse License Number 592521 to Sherri Still, aka Sherri Harris, aka Sherri  
24 Williamson ("Respondent"). The Registered Nurse License was in full force and effect at all  
25 times relevant to the charges brought herein and will expire on March 31, 2015, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following  
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.

1  
2 4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline  
3 any licensee, including a licensee holding a temporary or an inactive license, for any reason  
4 provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license  
6 shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the  
7 licensee or to render a decision imposing discipline on the license.

8 6. Section 118, subdivision (b), of the Code provides that the suspension, expiration,  
9 ~~surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a~~  
10 ~~disciplinary action during the period within which the license may be renewed, restored, reissued~~  
11 ~~or reinstated.~~

## 12 STATUTES

13 7. Section 2761 of the Code states:

14 "The board may take disciplinary action against a certified or licensed nurse or deny an  
15 application for a certificate or license for any of the following:

16 "(a) Unprofessional conduct, which includes, but is not limited to, the following:

17 . . . .

18 "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action  
19 against a health care professional license or certificate by another state or territory of the United  
20 States, by any other government agency, or by another California health care professional  
21 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that  
22 action."

## 23 COST RECOVERY

24 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
25 administrative law judge to direct a licentiate found to have committed a violation or violations of  
26 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
27 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
28

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
2 included in a stipulated settlement.

3 **CAUSE FOR DISCIPLINE**

4 (Discipline by the Nevada Board of Nursing)

5 9. Respondent is subject to disciplinary action under Code section 2761, subdivision  
6 (a)(4) on the grounds of unprofessional conduct in that Respondent's registered nurse license was  
7 disciplined by the Nevada State Board of Nursing ("Nevada Board") as follows:

8 10. On or about July 14, 2004, in a case entitled *In the Matter of Sherri Harris Licensed*  
9 *Professional Nurse-Nevada-License-No. RN25153-Respondent*, Case No. 0117-04C, the Nevada  
10 Board issued Findings of Fact, Conclusions of Law and Order ("Order") which publically  
11 reprimanded Respondent's license and required her to take two Board-approved ethics courses.  
12 The Order was based upon the following facts, to which Respondent admitted:

13 (a) On January 11, 2004, Respondent was employed and working as a registered  
14 nurse at St. Rose Dominican Hospital in Las Vegas, Nevada. That day, while Respondent was  
15 working in the Neonatal Intensive Care Unit, a four day old infant in Respondent's care fell of a  
16 scale and onto the floor.

17 (b) After the infant fell, Respondent failed to notify the physician, failed to notify  
18 the family, failed to document the incident in the medical record, failed to report the incident to  
19 the following shift, and failed to complete an incident report per hospital policy.

20 **PRAYER**

21 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
22 and that following the hearing, the Board of Registered Nursing issue a decision:

23 1. Revoking or suspending Registered Nurse License Number 592521, issued to Sherri  
24 Still, aka Sherri Harris, aka Sherri Williamson;

25 2. Ordering Sherri Still, aka Sherri Harris, aka Sherri Williamson, to pay the Board of  
26 Registered Nursing the reasonable costs of the investigation and enforcement of this case,  
27 pursuant to Business and Professions Code section 125.3; and

28 ///

1 3. Taking such other and further action as deemed necessary and proper.

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4 DATED: FEBRUARY 13, 2013

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*for* *Stacie' Ben*  
LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant